

February 13, 1987

Permit Contact, Permits Branch (E-4)  
U.S. Environmental Protection Agency  
215 Fremont Street  
San Francisco, CA 94105

Gentlemen:

Enclosed are completed EPA Forms 3510-1 and 3510-3 constituting Universal Propulsion Company, Inc.'s (UPCo) Part A application submitted pursuant to A.C.R.R. R9-8-1870 and 40 C.F.R. 270.10 (e). UPCo will first become subject to regulation under A.C.R.R. R9-8-1864 and -1865 (40 C.F.R. Parts 264 and 265) on March 24, 87. That is the date on which the standards of 40 C.F.R. Parts 264 and 265 will become applicable to 100-1000 generators treating, storing, or disposing of hazardous waste on-site using nonexempt management practices. 51 Fed. Reg. 10146 (March 24, 1986).

UPCo normally generates between 100 and 1,000 kilograms per month of hazardous wastes. The bulk of those hazardous wastes, composed of waste solid propellants (Class B explosives) and waste oxidizers, is treated on-site by open burning. That open burning has been authorized under a state permit to manage industrial solid waste pursuant to A.C.R.R. R9-8-1861 and 40 C.F.R. 261.5(g)(3) (iv). The open burning was previously exempted from interim status standards by A.C.R.R. R9-8-1865.B and 40 C.F.R. 265.1(c) (5).

On March 15, 1983, UPCo submitted a previous Part A application due to a mistaken interpretation of UPCo's activities. Until the recent change in the regulations, UPCo has been exempt from regulation as a small-quantity generator.

UPCo has not and has no plans to store, dispose of, or treat in any manner other than as stated above any hazardous waste at its facility to the extent that those activities would be subject to regulation under A.C.R.R. R9-8-1864 and -1865 and 40 C.F.R. Parts 264 and 265. UPCo will continue to handle all of its hazardous wastes in a responsible manner and will maintain its cooperation with EPA and with ADHS under the Arizona hazardous waste management system.



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Also enclosed is a completed form 8700-12, Notification of Hazardous Waste Activity, which updates UPCo's former notification to reflect current practices.

Thank you for your assistance in this matter.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.



W. E. Hallas  
Facilities and Safety Director

Encl. Forms 3510-1 and 3510-3  
Form 8700-12

WEH:mac

cc. Arizona Department of Health Services  
2005 N. Central Avenue  
Phoenix, AZ 85004  
Attention: Hazardous Waste Permits Unit

